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*** Via ECF only ***

Hon. Judge Anita B. Brody
U.S. Eastern District Court of Pennsylvania
601 Market Street, Room 7613
Philadelphia, PA 19106

RE: Lewis, et al. v. Kansas City Chiefs Football Club, Inc.; No.: 2:14-CV-1995-AB

Dear Judge Brody:

Please be advised that I represent Cindy Phillips. Ms. Phillips is Plaintiff, Joseph Phillips' former wife.

This letter is in reply to counsel for the Kansas' City Chiefs, Mr. Bruce Birenboim's letter dated September 6, 2018. (ECF No. 63).

When Ms. Phillips recently discovered that this litigation was pending, she contacted our firm for representation. We placed Mr. Phillips' counsel on notice of our representation. We also asked Mr. Phillips' counsel -- twice -- to advise us of any current settlement discussions and to protect Ms. Phillips' potential interest in any settlement that might be reached. Mr. Phillips' counsel did not respond to our requests.

We then filed Ms. Phillips' Motion to Intervene. (ECF No. 62).

Counsel for the Kansas' City Chiefs, Caitlin Grusauskas, contacted us yesterday to request that we consent to an extension to file objections to our Motion to Intervene.

My associate, Mary Conn, spoke with Ms. Grusauskas in this regard. Ms. Conn asked Ms. Grusauskas if any settlement discussions were taking place. Ms. Grusauskas would not provide such information.

Ms. Conn then asked Ms. Grusauskas for assurance that Ms. Phillips' potential interest in any settlement would be protected while her Motion to Intervene was pending. Ms. Grusauskas would not provide that assurance.

Accordingly, without assurance that our client's interest will be protected in the event of a settlement, we are not able to consent to an extension for filing objections to our Motion.

Respectfully Submitted,

TERSHEL & ASSOCIATES

PAT/mef

/s/ Paul A. Tershel, Esquire

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